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June 16, 2025

By ECF

Honorable Joseph A. Marutollo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room N324
Brooklyn, New York 11201

Re: Lynch v. The Department of Education et al.,
24-cv-7795-DG-JAM

Dear Magistrate Judge Marutollo:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, attorney for defendants Department of Education of the City of New York and David Banks in the above-referenced action.

Defendants write, on behalf of the parties, in accordance with the Court's Order of May 15, 2025, to file a joint status report.

Defendants served initial disclosures and their first set of interrogatories and document demands on Plaintiff on April 10, 2025. Plaintiff served initial disclosures and what appear to be discovery demands on Defendants on April 11, 2025. Plaintiff served her responses to the first set of document demands on May 27, 2025. In accordance with the Court's Order of June 12, 2025, Defendants will serve their responses to Plaintiff's first set of document demands on or before July 13, 2025. Defendants will serve their Reply to Plaintiff's opposition, if any, on or before July 28, 2025.

Depositions have yet to be scheduled. At this time, Defendants anticipate deposing Plaintiff and, although they do not anticipate taking additional depositions, they reserve the right to do so. The parties will confer and work cooperatively to schedule and conduct Plaintiff's deposition after Defendants receive satisfactory responses to their discovery demands. The current deadline for the close of fact discovery is September 11, 2025.

No disputes of discovery have arisen based on the discovery the parties have conducted to date.

In light of this Court's encouragement of early settlement discussions, Defendants requested an initial demand from Plaintiff on April 7, 2025, and, received a settlement demand from Plaintiff on June 11, 2025, and will take it under advisement in good faith. However, based on Defendants' current view of the case, Defendants will likely not be interested in attending a settlement conference or mediation because, at this stage in the litigation, we do not believe it would be a productive use of time and resources. Should Defendants' view of the case change Defendants will promptly advise the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Ilona Ehrlich

Ilona J. Ehrlich

Assistant Corporation Counsel

cc: Corrine Lynch (By ECF)
Pro Se Plaintiff